

Honorable John H. Chun

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
TACOMA DIVISION

MATTHEW BECKER, a Washington resident;
LAUREN KUEHNE, a Washington resident;
ADAM CRISWELL, a Washington resident;
KRYSTAL CRISWELL, a Washington
resident; ALFEE DIXON, a Washington
resident; TYSON FARLEY, a Washington
resident; DONALD FINISTER SR., a
Washington resident; CHRISTOPHER HART,
a Washington resident; JASON KOVACK, a
Washington resident; RICKY LORENSIUS, a
Washington resident; HEATHER MAREK, a
Washington resident; MICHAEL MARTIN, a
Washington resident; DAISEY MARTINEAR,
a Washington resident; GRACE MATEIAK, a
Washington resident; IAN MATEIAK, a
Washington resident; JOHN MELOPRIETO, a
Washington resident; TRAVIS NEUMAN, a
Washington resident; ARIEL NEUMAN, a
Washington resident; MICHELLE PAULINO,
a Washington resident; JOHN PAULINO, a
Washington resident; JAMES RAMPONI, a
Washington resident; LINDSEY RAMPONI, a
Washington resident; ERIC MCCANDLESS, a
Washington resident; PAIGE ROE, a
Washington resident; PAUL ROHRER, a
Washington resident; ANDREW SICAT, a
Washington resident; NICOYA MCKINSEY, a
Washington resident; JEREMY SIERRA, a
Washington resident; ERICA SIERRA, a
Washington resident; DARIUS USMAN, a
Washington resident; KRISTEN ZABAGLO, a
Washington resident; DAVID WILSON, a
Washington resident; IAN LAUGHLIN, a
Washington resident; SHELLY LAUGHLIN, a
Washington resident; TAMMARA BOYLES, a
Washington resident; and BOBBY BOYLES, a

Cause No. 3:21-cv-05185-JHC

FOURTEENTH DECLARATION OF
TODD SKOGLUND IN SUPPORT OF
PLAINTIFFS' MOTION IN LIMINE

FOURTEENTH DECLARATION OF TODD SKOGLUND IN
SUPPORT OF PLAINTIFFS' MOTION IN LIMINE - 1
(Cause No. 3:21-cv-05185-JHC)

SKOGLUND LAW LLC
704 228TH AVE. NE #186
SAMMAMISH, WA 98074
PHONE: 425.406.6777

Washington resident; LAIN SUPE, a
Washington resident; TIM WRIGLEY, a
Washington resident; BILLY LUNSFORD, a
Washington resident; ROBIN LUNSFORD, a
Washington resident; CAMERON
FLEWELLEN, a Washington resident;
CHELSEA FLEWELLEN, a Washington
resident; MOHAMMAD SIDDIQUE, a
Washington resident; AMY HO, a Washington
resident; MATTHEW GROFF, a Washington
resident;

Plaintiffs,

vs.

TIG INSURANCE COMPANY, as successor
by merger to AMERICAN SAFETY
INDEMNITY COMPANY, a foreign insurer;
ARCH EXCESS & SURPLUS INSURANCE
COMPANY, a foreign insurer; UNITED
SPECIALTY INSURANCE COMPANY, a
foreign insurer; TRAVELERS INDEMNITY
COMPANY, a foreign insurer; ARCH
INSURANCE GROUP, a foreign insurer;
ATLANTIC CASUALTY INSURANCE
COMPANY, a foreign insurer; NEVADA
CAPITAL INSURANCE COMPANY, a
foreign insurer; NAUTILUS INSURANCE
COMPANY, a foreign insurer; WESTERN
WORLD INSURANCE, a foreign insurer;
OHIO CASUALTY INSURANCE
COMPANY, a foreign insurer; PREFERRED
CONTRACTORS INSURANCE CO. RRG
LLC, a foreign insurer;

Defendants.

I, TODD K. SKOGLUND, declare under the penalty of perjury and in accordance with
the laws of the State of Washington I am over 18 years old, competent to testify, am the attorney
for Plaintiffs, and make this Declaration based on personal knowledge.

1. Attached hereto as *Exhibit 1* is a true and correct copy of a correspondence from
Skoglund Law to Lane Powell dated November 28, 2022

1 2. Attached hereto as *Exhibit 2* is a true and correct copy of the email chain between
2 Todd Skoglund and Stephania Denton dated November 28, 2022, ending on December 19,
3 2022.

4 3. Attached hereto as *Exhibit 3* is a true and correct copy of a correspondence from
5 Skoglund Law to Lane Powell dated December 12, 2022

6 4. Attached hereto as *Exhibit 4* is a true and correct copy of a correspondence
7 between Todd Skoglund to Lane Powell sent on January 3, 2023.
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9 5. Attached as Exhibit 5 is a true and correct copy of a correspondence between
10 Todd Skoglund and Lane Powell sent on January 4, 2023.

11 6. My 11-year-old daughter came down with the flu or another bug which drove
12 her temperature to over one hundred on December 24, 2022. She suffered hot and cold flashes
13 and body aches so severe she could not sleep more than two hours without the pain waking her
14 up. The bug and the symptoms started dissipating in 24 hours and were gone in 36 hours. On
15 December 26, 2022, I woke up and started work as my parents, siblings, and their kids did the
16 usual holiday activities. The bug hit me like a freight train. I had all the same symptoms as my
17 daughter, plus another. The bug also lasted twice as long, and I did not leave my room for three
18 days, only to get crackers and water. Since January 2, 2023, I have worked at least ½ every
19 day trying to catch up
20

21 7. Attached hereto as *Exhibit 7* is a true and correct copy of correspondence from
22 Todd Skoglund to Lane Powell, dated December 9, 2022.

23 8. Attached hereto as *Exhibit 8* is a true and correct copy of the email sent by SL
24 to Lane Powell with the five motions in Limine attached, dated December 22, 202.
25

1 9. Attached hereto as *Exhibit 9* is a true and correct copy of correspondence from
2 Patrick McKenna to Casey & Skoglund, Dated October 11, 2017.

3 10. Deleted

4 11. Attached hereto as *Exhibit 11* is a true and correct copy of correspondence
5 between Barry Neville and Laura Taylor, dated November 3, 2017.

6 12. Attached as *Exhibit 12* is a true and correct copy of an email between Patrick
7 McKenna and Bill Morrow, dated December 14, 2017.

8 13. Attached as *Exhibit 13* is a true and correct copy of an email between Morrow
9 & White and Patrick McKenna, dated December 14, 2017.

10 14. Attached as *Exhibit 14* are true and correct copies of all Gillaspay & Rhodes
11 invoices for the East Park matter.

12 15. Attached hereto as *Exhibit 15* are true and correct copies of certificates of
13 occupancy for each lot at East Park Highmark is believed to have been involved with.

14 16. Attached hereto as *Exhibit 16* is a true and correct copy of an email from Anne
15 Prewitt to insurers regarding billing, dated August 27, 20128.

16 17. Attached hereto as *Exhibit 17* is a true and correct copy of an email from Anne
17 Prewitt to insurers regarding billing, dated September 6, 2018.

18 18. Attached hereto as *Exhibit 18* is a true and correct copy of an email between Lily
19 Yee and Bill Morrow, dated November 21, 2018.

20 19. Attached hereto as *Exhibit 19* are true and correct copies of an email string
21 between Bill Morrow and McKenna, dated October 29, 2018

22 20. Attached hereto as *Exhibit 20* is a true and correct copy of an email between Bill
23 Morro & Patrick, dated October 29, 2018.

1 21. Attached hereto as *Exhibit 21* is a true and correct copy of an email string
2 between Marc Le Peaux and Bill Morro & Patrick, dated October 30, 2018

3 22. Attached hereto as *Exhibit 22* is a true and correct copy of an email string
4 between Bill Morro & Leslie Noland Patrick, dated November 21, 2018. ASIC 1207.

5 23. Attached hereto as *Exhibit 23* is a true and correct copy of an email string
6 between Bill Morro & Leslie Noland dated November 21, 2018. ASIC 1207.

7 24. Attached hereto as *Exhibit 24* is a true and correct copy of an email string
8 between Lily Yee and Bill Morrow, dated December 8, 2018.

9 25. Attached hereto as *Exhibit 25* is a true and correct copy of Lily Yee's report sent
10 to Bill Morrow, dated December 19, 2018.

11 26. Attached hereto as *Exhibit 26* is a true and correct copy of a letter from Stephania
12 Denton, dated February 16, 2022.

13 27. Attached hereto as *Exhibit 27* is a true and correct copy of an email between Bill
14 Morrow and Patrick McKenna, dated October 30, 2018.

15 28. Attached hereto as *Exhibit 28* is a true and correct copy of an email between Lily
16 Yee Morrow and Leslie Noland dated November 28, 2018

17 29. Attached hereto as *Exhibit 29* is a true and correct copy of an email from Anne
18 Prewitt to insurers regarding billing, dated February 13, 2019.

19 30. Attached hereto as *Exhibit 30* is a true and correct copy of a letter from Skoglund
20 law to carriers' reasonableness hearing, dated July 15, 2020

21 31. Attached hereto as *Exhibit 31* is a true and correct copy of the findings of facts
22 conclusions of law entered on October 9, 2020, in the underlying matter.

1 32. Attached hereto as *Exhibit 32* is a true and correct copy of the Order entering the
2 findings of facts and conclusions of law entered on October 9, 2020, in the underlying matter.


3 33. Attached hereto as *Exhibit 33* is a true and correct copy of the judgment entered
4 on October 9, 2020, in the underlying matter.

5 34. Attached hereto as *Exhibit 34* is a true and correct copy of an email; string
6 between June Allen and Dan Lounsbery the findings of facts and conclusions of law entered on
7 October 9, 2020, in the underlying matter.

8 I SWEAR UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF
9 WASHINGTON THAT THE PRECEDING IS TRUE AND CORRECT.
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11 EXECUTED at Sammamish, Washington, this 5th day of January 2023.

12 SKOGLUND LAW LLC

13 By: 
14 Todd K. Skoglund, WSBA #30403
15 Attorney for Plaintiff
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